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Attorneys for Defendant

Allan Pharmaceutical LLC

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- x
LOUIS DRETCHEN,

Plaintiff,

v.

ALLAN PHARMACEUTICAL LLC,

Defendant.
----- x

:
: 07 Civ. 10306 (CLB) (LMS)
:

:
: **DECLARATION OF RAJU V.K.**
: **VEGESNA**
:

:
: **ECF CASE**
:

I, Raju V.K. Vegesna, hereby certify and declare as follows:

1. I am President of Allan Pharmaceutical LLC (“Allan Pharma”). Based upon my personal knowledge and understanding, I am competent to attest to the matters within this Declaration in further support of Allan Pharma’s motion to transfer this case from the United States District Court for the Southern District of New York to the Southern District of Mississippi.

2. Dretchen and I attended dozens of meetings in De Kalb, Mississippi. I am aware of no leadership meetings—or meetings of any kind—ever held in New York.

3. Until early 2007, I had no idea that Dretchen was a convicted felon or that he was not a registered pharmacist. That discovery was entirely inconsistent with my regular interactions with Dretchen during his employment.

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4. He regularly referred to himself in sales literature and in his communications with others as a registered pharmacist.

5. As a matter of fact, he and I attended a continuing education seminar for pharmacists from April 5 through 8, 2006 in Seattle, Washington (at the company's expense) because, as he said, "we" needed the continuing education credits to maintain our pharmacy licenses.

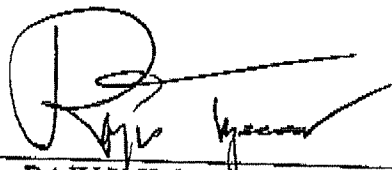
6. I was (and remain) shocked to learn that Dretchen is not a registered pharmacist.

7. I travel to Mississippi on a regular basis and am readily available in Mississippi to participate in the case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated at De Kalb, Mississippi
this 15 day of January, 2008

By:



RAJU V.K. VEGESNA, R.Ph
President
Allan Pharmaceutical LLC

